

# EXHIBIT

# A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
ADRIAN THOMASON ,

Plaintiff

INDEX NO.:

DATE FILED:

SUMMONS WITH NOTICE

-against-

TARGET CORPORATION and TARGET ENTERPRISES, INC.

Defendants.  
-----X

Bronx County is designated as the place of trial. The basis of venue is the place of occurrence, 40 West 225th Street, Bronx, New York 10463.

Plaintiff resides 213 Nagle Avenue, New York, New York 10034.

Defendant Target Corporation, Target Plaza, 1000 Nicollet Mall, Minneapolis, Minnesota 55403.

Defendant Target Enterprises, Inc. Target Plaza, 1000 Nicollet Mall, Minneapolis, Minnesota 55403.

**TO THE ABOVE-NAMED DEFENDANTS:**

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney, within twenty (20) days after the service of this summons, exclusive of the day of service, where service is made upon you personally within the State of New York or within thirty (30) days after service is complete if this summons is not served personally to you within the State of New York. In the event you fail to answer or appear, judgment will be taken against you by default for the relief

demanded in the complaint.

Dated: New York, New York  
September 14, 2020

**NOTICE:** The nature of this action is for recovery of monetary damages for personal injury and negligence arising out of a slip and fall in defendants' store on or about October 10, 2017,

**THE RELIEF SOUGHT IS:** monetary damages for personal injuries sustained by plaintiff as a result of defendants' negligence.

**Upon your failure to answer or appear, judgment will be taken against you for a sum to be determined by the Court, with interest, costs and disbursements from October 10, 2017.**

Yours, etc.



Pecoraro & Schiesel

By: Steven G. Schiesel, Esq.

Attorney for Plaintiff

41 Madison Avenue, 31<sup>st</sup> Floor

New York, New York 10010

Telephone: 212-344-5053

Facsimile: 212-344-5055

Email: [StevenSchiesel@p-s-law.com](mailto:StevenSchiesel@p-s-law.com)

TO:

Target Corporation  
Target Plaza  
1000 Nicollet Mall  
Minneapolis, Minnesota 55403

Target Enterprises, Inc.  
Target Plaza  
1000 Nicollet Mall  
Minneapolis, Minnesota 55403

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
ADRIAN THOMASON ,

Plaintiff

INDEX NO.:

DATE FILED:

VERIFIED COMPLAINT

-against-

TARGET CORPORATION and TARGET ENTERPRISES, INC.

Defendants,  
-----X

Plaintiff, complaining of the defendants, by and through her attorneys, Pecoraro & Schiesel LLP, alleges as follows:

***THE PARTIES***

1. At all times mentioned herein, the plaintiff was and still is a resident of the State of New York, County of New York.
2. At all times mentioned herein, the defendant, Target Corporation, was and still is a foreign corporation duly authorized to transact and engaged in the transaction of business within the State of New York.
3. At all times mentioned herein, the defendant, Target Corporation, was and still is a domestic corporation duly organized under and existing by virtue of the laws of the State of New York.
4. At all times mentioned herein, the defendant, Target Enterprises, Inc., was and still is a foreign corporation duly authorized to transact and engaged in the transaction of business

within the State of New York.

5. At all times mentioned herein, the defendant, Target Enterprises, Inc, was and still is a domestic corporation duly organized under and existing by virtue of the laws of the State of New York.

6. At all times mentioned herein, the defendant, Target Corporation, owned the Target store located at 40 West 225th Street, Bronx, New York 10463.

7. At all times mentioned herein, the defendant, Target Corporation, operated, serviced, managed, repaired and maintained the Target store located at 40 West 225th Street, Bronx, New York 10463.

8. At all times mentioned herein, the defendant, Target Enterprises, Inc., owned the Target store located at 40 West 225th Street, Bronx, New York 10463.

9. At all times mentioned herein, the defendant, Target Enterprises, Inc., operated serviced, managed, repaired and maintained the Target store located at 40 West 225th Street, Bronx, New York 10463.

***AS AND FOR A FIRST CAUSE OF ACTION***

10. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of the complaint marked and designated "1" through "9", inclusive, with the same force and effect as if set forth at length herein.

11. That on or about October 10, 2020, the plaintiff was lawfully inside defendants' Target store located at 40 West 225th Street, Bronx, New York 10463.

12. That on or about October 10, 2017, as the Plaintiff was lawfully walking inside

defendants' store, she was caused to slip and fall due to a slippery and hazardous condition on the floor.

13. That as a result of the fall, the plaintiff was seriously injured, sustained a fracture, and was rendered permanently sick, sore, lame and disabled.

14. That the aforementioned fall, and resultant injuries, were proximately caused by defendants' carelessness and negligence, by and through their employees, agents, and servants, both jointly and severally, in the following manner: by causing a foreign substance to be placed on and remain on the floor, thereby causing a slippery and dangerous condition; by placing and allowing soap and/or cleaning fluid to be placed on and remain on the floor, thereby causing a slippery and dangerous condition; by failing to properly clean the floor, thereby causing a slippery and dangerous condition; by failing remove slipping hazards on the floor; by creating a dangerous, hazardous, trap-like condition for shoppers, including plaintiff; acting in disregard for the safety of others, including plaintiff; by failing to remove debris from floor; by failing to inspect the floor; by failing to have a proper inspection program in place and by being otherwise careless and negligent under the circumstances.

15. That defendants, and their agents, servants and employees had notice of the conditions complained of herein.

16. That by reason of the foregoing, the plaintiff was damaged in a sum of money that exceeds the jurisdictional limits of all lower Courts that would otherwise have jurisdiction over this action.

***DEMAND FOR JURY TRIAL***

The plaintiff hereby demands a jury trial in the event that this action is successfully removed to Federal Court.

WHEREFORE, the plaintiff demands judgment against each defendant as follows: An amount of money to be determined by a jury at trial, together with interest, costs and disbursements.

Dated: New York, New York  
September 14, 2020

Yours, etc.



Pecoraro & Schiesel  
By: Steven G. Schiesel, Esq.  
Attorney for Plaintiff  
41 Madison Avenue, 31<sup>st</sup> Floor  
New York, New York 10010  
Telephone: 212-344-5053  
Facsimile: 212-344-5055  
Email: [StevenSchiesel@p-s-law.com](mailto:StevenSchiesel@p-s-law.com)

TO:

Target Corporation  
Target Plaza  
1000 Nicollet Mall  
Minneapolis, Minnesota 55403

Target Enterprises, Inc.  
Target Plaza  
1000 Nicollet Mall  
Minneapolis, Minnesota 55403

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 09/15/2020

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
ADRIAN THOMASON ,

Plaintiff

VERIFICATION

-against-

TARGET CORPORATION and TARGET ENTERPRISES, INC.

Defendants.

-----X  
STATE OF NEW YORK }

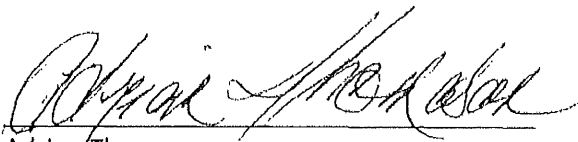
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COUNTY OF NEW YORK }

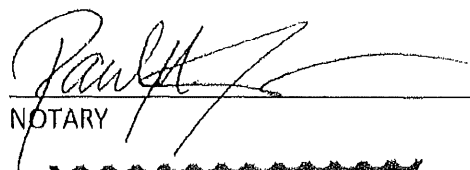
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Adrian Thomason, being duly sworn, deposes as says:

1. I am the plaintiff in the above-captioned action. I reside at 213 Nagle Avenue, New York, New York 10034. I make this verification, under oath, with full knowledge of the facts and circumstances of this action against Target Corporation and Target Enterprises, Inc.
2. I have read the foregoing complaint and know the contents thereof; that the same are true to my own knowledge, except as to those matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

  
Adrian Thomason

Sworn to before me this 14th day  
of September, 2020.

  
NOTARY

PAUL M SERRANO  
Notary Public - State of New York  
NO. 015F6379341  
Qualified in New York County  
My Commission Expires Aug 13, 2022.



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

=====

ADRIAN THOMASSON,

Plaintiff,

-against-

TARGET CORPORATION and TARGET ENTERPRISES, INC

Defendants.

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SUMMONS & COMPLAINT

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PECORARO & SCHIESEL LLP  
Attorneys for Plaintiff  
41 Madison Avenue, 31<sup>st</sup> floor  
New York, New York 10010  
Telephone: (212) 344-5053  
Facsimile: (212) 344-5055

=====

PLEASE TAKE NOTICE:

[ ] NOTICE OF ENTRY - That the within is a true copy of an Order entered in the office of the Clerk of the within-named Court on

[ ] NOTICE OF SETTLEMENT - That the within is a true copy of a which will be presented for settlement to one of the Justices of the within-named Court, on at 9:30 a.m., or as soon thereafter as counsel may be heard.

Respectfully,

*Steven G. Schiesel*  
Pecoraro & Schiesel, LLP

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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ADRIAN THOMASON,

Index No.: 30296/2020E

Plaintiff,

-against-

TARGET CORPORATION and TARGET  
ENTERPRISES, INC.,

Defendants.

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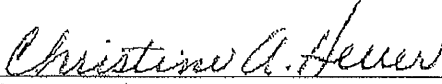
AFFIDAVIT OF SERVICE

I, Christine A. Heuer, being first duly sworn on oath, state that I am at least 18 years of age and not a party to this action, and that on September 21, 2020, at 1:50 PM, I served a true and correct copy of the NOTICE OF ELECTRONIC FILING; SUMMONS WITH NOTICE; VERIFIED COMPLAINT; and DEMAND FOR JURY TRIAL on **TARGET CORPORATION**, therein named, at **Target Corporate Offices, 1000 Nicollet Mall, Mailroom**, in the City of **Minneapolis**, State of **Minnesota 55403**, by handing to and leaving with Shaurice Gregory, Mail Clark, personally a true and correct copy of each document thereof.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Minn. Stat. § 358.116.

Dated: September 30th, 2020

  
(Signature of process server)

Legal Process Minnesota, LLC, 211 Douglas Dr., Glencoe, MN 55336  
www.legalprocessmn.com | info@legalprocessmn.com  
1-800-864-7612

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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ADRIAN THOMASON,

Index No.: 30296/2020E

Plaintiff,

-against-

TARGET CORPORATION and TARGET  
ENTERPRISES, INC.,

Defendants.

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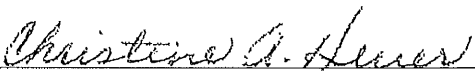
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